



February 27, 2012

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

RE: **Ex parte filing** in CC Docket Nos. 96-45 and 01-92; WC Docket Nos. 03-109, 05-337, 07-135 and 10-90; WT Docket No. 10-208 and GN Docket No. 09-51

Dear Ms. Dortch:

On February 27, Steve Merriam from Arctic Slope Telephone Association Cooperative, Dave Dengel from Copper Valley Telephone Cooperative, Inc., Brenda Shepherd from Interior Telephone Company, Inc. and Mukluk Telephone Company, Inc., and I conducted an ex parte meeting with Angela Kronenberg from Commissioner Clyburn's office.

The ex parte meeting consisted of a discussion of the attached documents related to Transformation Order impacts for the four study areas. In the third paragraph of her concurring statement with the Transformation Order, Commissioner Clyburn stated in part the goal "*to avoid inadvertently harming the success we have already achieved through our legacy system.*" The attachments demonstrate significant harm will be caused by the Transformation Order for these Alaska carriers serving some of the highest cost areas in the country.

We discussed specific flaws in the quantile regression approach for Copper Valley. We discussed satellite connectivity issues for Arctic Slope and Interior/Mukluk (TelAlaska) and provided a copy of projected satellite capacity (27 transponders) needed to serve TelAlaska customers at the targeted rate.

As required by the Commission's rules, this ex parte record is now filed in the above referenced dockets. If there are any questions, please call me on 503.612.4409.

Respectfully submitted,

Via ECFS 2/27/12

Jeffrey H. Smith
Vice-President and Division Manager, Western Region
Chairman of the Board of Directors

Copy to

Angela Kronenberg

Steve Merriam, Arctic Slope Telephone Association Cooperative
Dave Dengel, Copper Valley Telephone Cooperative, Inc.
Brenda Shepherd, Interior Telephone Company, Inc. and Mukluk Telephone Company, Inc.

Attachments